



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

AUG 12 2011

REPLY TO THE ATTENTION OF:

Michael E. Hopkins, P.E.
Assistant Chief, Permitting
Ohio EPA, Division of Air Pollution Control
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

Dear Mr. Hopkins:

The U.S. Environmental Protection Agency has the following comments on the proposed minor source preconstruction Permit to Install and Operate for Sandusky-Clyde Energy Solutions, in Clyde, Ohio (facility ID 0372022003, permit number P0108257):

1. In the permit application and in recent newspaper articles, the company discusses a possible phase 2 that would include pyrolyzing municipal solid waste and combusting the pyro-gas to produce electricity. As you are aware, EPA considers it to be circumvention when projects are broken into multiple smaller phases that avoid major source permitting that would likely have been triggered if the project was evaluated in total. At this point, assuming the current project can proceed independently and is not reliant on phase 2 for its future viability, we can only refer to the future possibility that such a phase 2 could trigger compliance issues covering the existing and future source. However, we do want Ohio EPA to be on notice regarding this issue.
2. As of July 1, 2011, a source can be a major source for its greenhouse gas (GHG) emissions alone if the potential to emit (PTE) is 100,000 tons per year or greater of carbon dioxide-equivalent, thus being subject to Prevention of Significant Deterioration requirements. Please provide the GHG PTE and explain whether the source is a major source of GHGs.

Thank you for your consideration. If you have any questions or concerns regarding these comments, please contact Richard Angelbeck, of my staff, at (312) 886-9698.

Sincerely,

A handwritten signature in black ink that reads "Richard Angelbeck for".

Pamela Blakley
Chief